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January 9, 2020

Re: *Contant, et al. v. Bank of America Corporation, et al.*, 17-cv-3139

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Dear Judge Schofield:

Pursuant to Rule I.B.2 of Your Honor's Individual Rules and Procedures for Civil Cases, we respectfully submit this letter on behalf of all non-settling defendants ("Defendants") in the above-referenced matter to request a one-week extension to submit a renewed motion for leave to file Plaintiffs' Third Consolidated Class Action ("TCCAC") with redactions. The new deadline would be January 17, 2020. Plaintiffs consent to Defendants' request.

Pursuant to the Court's order dated December 23, 2019 (the "Order"), the current deadline to submit a renewed motion for leave to file the TCCAC with redactions is January 10, 2020. (ECF No. 368.) Although the Order directs Plaintiffs to file this renewed motion (*id.* at 2), the potential redactions at issue in the TCCAC concern Defendants' documents and communications. Accordingly, the Order requires Defendants to provide as part of Plaintiffs' renewed motion "an explanation . . . as to why each requested redaction contains information that should not be publicly disclosed." (*Id.*)

Defendants respectfully submit that an extension of the deadline to January 17, 2020 is reasonable and appropriate in light of the recent holidays and for the reasons discussed with the Court today. No previous requests for an extension of time have been made concerning this deadline. Moreover, this extension of time would not affect other scheduled dates in this action.

Respectfully submitted,

/s/ Paul S. Mishkin  
Paul S. Mishkin

cc: Counsel for all parties via ECF